

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

MELISSA L. CECOLINI,

Debtor.

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Chapter 7

Case No. 19-17459-mdc

RESPONSE IN OPPOSITION TO MOTION TO REDEEM

Prudential Savings Bank (“Prudential”), by and through its counsel Obermayer Rebmann Maxwell & Hippel LLP files this Response in Opposition to the Motion to Redeem filed by Melissa Cecolini (the “Debtor”) and states as follows:

1. Denied. It is specifically denied that the property in question is tangible personal property, and strict proof is demanded upon a hearing.
2. Admitted.
3. Denied. Strict proof is demanded upon a hearing.
4. Denied. Strict proof of the ability to make payment from exempt funds is demanded upon a hearing.

WHEREFORE, Prudential requests the Court enter an order denying the Debtor’s Motion to Redeem.

Respectfully submitted,

Dated: February 20, 2020

By: /s/ Michael D. Vagnoni
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